

IN THE UNITED STATES DISTRICT COURT  
OF THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

SUNTRUST MORTGAGE, INC.,	)	
a Virginia Corporation	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 3:11-cv-565-MHL
	)	
LCMG, INC.	)	
a South Carolina Corporation	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

COMES NOW Plaintiff, SunTrust Mortgage, Inc. (“SunTrust”), and files this Motion for Entry of a Protective Order in this matter. SunTrust seeks entry of an Order to protect it from annoyance, oppression, undue burden, and expense in responding to Defendant’s First Set of Interrogatories and First Set of Requests for Production of Documents and to Defendant’s topics for examination of SunTrust’s corporate designees pursuant to Rule 30(b)(6). SunTrust’s position is more fully set forth in its Memorandum in Support of Motion for Entry of Protective Order filed herewith.

**Rule 26(c) Certification**

The undersigned counsel for the SunTrust certifies that he has in good faith attempted to confer with Defendant’s counsel in an effort to resolve this dispute without court action.

WHEREFORE, SunTrust requests entry of a Protective Order with respect to Defendant’s First Set of Interrogatories and First Set of Requests for Production of Documents and to Defendant’s topics for examination of SunTrust’s corporate designees pursuant to Rule 30(b)(6).



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